J. Napor - by Mr. Sieminski

unwilling to provide any additional credit beyond what we had done without payment guarantees and additional documentation to protect us.

Q. So you asked Plaza to submit an account application, a copy of which is appended to the Complaint as Exhibit A?

A. My recollection is that we wanted to formalize what we were and put protections in place because we were running into larger amounts, larger credit amounts and credit requests, so whatever we had was not adequate to give us a comfort level to provide them any additional credit.

Q. As of July 1998 was there a substantial account receivable that was on your books that you were concerned about?

A. As of this statement, Exhibit 3, which was dated March --

MR. REILLY: That is '97. His question was --

A. Isn't that what we are talking about?

Q. Actually, I said as of July 1998.

EXHIBIT 8

J. Napor - by Mr. Sieminski

Mr. Reilly's observation, which I'm happy to have you answer too, do you have any document that you can refer to to tell me whether there was an account receivable owed to WRS by Plaza as of July 1998 and if so what was that amount?

MR. REILLY: May I show him the Answers to Interrogatories which has the documents in it?

MR. SIEMINSKI: Sure.

A. Can you repeat the last question please.

(Last question read back.)

BY MR. SIEMINSKI:

Q. Sometimes the answer to a question is I don't know. Apparently this is one of those situations. I'm not trying to be overly negative, but we have three people now poring over an unorganized set of documents for ten minutes and nobody can find the answer to the question, so it may be here in this room and it is your recollection you don't have an answer to the question right now?

A. Okay. Yeah, we can't find what you are asking for in July.